

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	Civil Case No. 1:25cv559
852,654.047192 USDT TOKENS SEIZED FROM THE	)	
CRYPTOCURRENCY WALLET ADDRESS	)	
IDENTIFIED BY	)	
Ty12X97szmYzAmYLsh86cbYfh9psufgeV,	)	
	)	
105,553.680342 USDT TOKENS SEIZED FROM THE	)	
CRYPTOCURRENCY WALLET ADDRESS	)	
IDENTIFIED BY	)	
TA86m1veBthXyvXcN1mDixgYNXChkMjhhZ, and	)	
	)	
1,013,192.066449 USDT TOKENS SEIZED FROM THE	)	
CRYPTOCURRENCY WALLET ADDRESS	)	
IDENTIFIED BY	)	
TPMVocf6Rv6bMLnRMX4RXoriiTbT9P82k2,	)	
	)	
Defendants <i>in Rem</i> .	)	

**MOTION FOR ENTRY OF DEFAULT JUDGMENT**

COMES NOW the United States of America, pursuant to Rule 55(b)(2), Fed. R. Civ. P., and herewith moves this Court for the entry of a default judgment and order of forfeiture in favor of the United States. In support of this motion, the Government states the following:

1. This is an *in rem* forfeiture action pursuant to 18 U.S.C. §§ 981(a)(1)(C) and (a)(1)(A) seeking the forfeiture of the defendant, 852,654.047192 USDT tokens seized from a cryptocurrency wallet address identified by TY12X97szmYzYAmYLsh86cbYfh9psufgeV, 105,553.680342 USDT tokens seized from a cryptocurrency wallet address identified by TA86m1veBthXyvXcN1mDixgYNXChkMjhhZ and 1,013,192.066449 USDT tokens seized from a cryptocurrency wallet address identified by PMVocf6Rv6bMLnRMX4RXoriiTbT9P82k2

(defendant property).

2. As stated in the undersigned's declaration in support of the United States' Request for Entry of Default filed on August 7, 2025 (Doc. 6 ), the Complaint for Forfeiture *In Rem* was filed on April 01, 2025 (Doc. 1). On May 22, 2025, the Warrant and Summons for Arrest of Articles *In Rem* was duly executed on the defendant property by the United States Marshals Service, pursuant to Supplemental Rule G(3)(b) and (c). A Proof of Service for an executed warrant for arrest *in rem* was filed with the Clerk of Court on June 4, 2025. (Doc. 4). Pursuant to Supplemental Rule G(4)(a), notice of this civil forfeiture action was published on an official Government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) for a period of 30 days, beginning on June 6, 2025, and the deadline for filing a claim or statement of interest expired on August 5, 2025. A Notice of Publication was filed with the Clerk of Court on August 7, 2025 (Doc. 5). The United States was not aware of any known potential claimants; therefore, no direct notice was sent. As of the date of execution of this motion, no answer has been filed by anyone claiming an interest in the defendant property.

3. On August 7, 2025, the United States filed a Request for Entry of Default, supported by an appropriate declaration. (Doc. 6).

4. On August 11, 2025, the Clerk entered the default of all persons as provided for by Rule 55(a), Fed. R. Civ. P. (Doc. 9).

5. Rule 55(b)(2), Fed. R. Civ. P., provides that in cases other than those seeking a judgment for a sum certain, the party seeking a judgment shall apply to the Court for the default judgment. In this case, the Government seeks the entry of a default judgment ordering the defendant property forfeited to the United States as prescribed by 21 U.S.C. § 881(a)(6).

Wherefore, the United States requests the entry of the proposed order of forfeiture submitted herewith.

Respectfully submitted,

ERIK S. SIEBERT  
UNITED STATES ATTORNEY

By: /s/Annie Zanolini  
Annie Zanolini  
Assistant United States Attorney  
California Bar No. 321324  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Office Number: (703) 299-3903  
Facsimile Number: (703) 299-3980  
Email Address: annie.zanolini2@usdoj.gov